

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF	)	<b>PUBLIC VERSION</b>
VENEZUELA,	)	
	)	
Defendant.	)	

**NOTICE OF SPECIAL MASTER’S TERMINATION  
OF DALINAR STOCK PURCHASE AGREEMENT AND  
EXECUTION OF AMBER STOCK PURCHASE AGREEMENT**

**PLEASE TAKE NOTICE THAT**, on September 19, 2025, the Special Master terminated that certain Stock Purchase Agreement, by and between Dalinar Energy Corporation and the Special Master, dated June 25, 2025 (the “**Dalinar SPA**”) in accordance with the Court’s ruling at the hearing on September 18, 2025, pursuant to which the Court authorized the Special Master to terminate the Dalinar SPA in order to enter into a stock purchase agreement with Amber Merger Sub LLC (“**Amber**”), a wholly-owned subsidiary of Amber Energy, Inc., and an affiliate of Elliott Investment Management L.P. See D.I. 2123 ¶ 2, 25; Sale Hr’g Tr. 1535:15-17 (September 18, 2025).

**PLEASE TAKE FURTHER NOTICE THAT**, on September 19, 2025, following termination of the Dalinar SPA, the Special Master entered into that certain Stock Purchase Agreement, by and between the Special Master and Amber (the “**Amber SPA**”). The Amber SPA is attached hereto as **Exhibit A**.<sup>1</sup>

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<sup>1</sup> In the public version of this *Notice of Special Master’s Termination of Dalinar Stock Purchase Agreement and Execution of Amber Stock Purchase Agreement*, certain redactions are applied to commercially sensitive information of CITGO. These redactions are consistent with redactions previously applied to stock purchase agreements. See e.g., D.I. 2123, Ex. B.

Respectfully submitted,

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Dated: September 19, 2025  
12469386 / 21202.00001

By: /s/ Myron T. Steele

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